

Re: Proceeding 19-41: Media Bureau Seeks Comment on TV Ratings System and Oversight Board.

The Campaign for a Commercial-Free Childhood (CCFC) urges the Commission to take steps to modernize the television ratings system. CCFC is a national advocacy organization that educates the public about the harmful effects of commercialism and advocates for an end to child-targeted marketing. We have about 40,000 members and many of them share their concerns with us.

Children today spend more time than ever with entertainment media. Parents are rightly concerned about the effects that violent and sexualized content can have on their children. Yet to make appropriate media choices, they need to both sift through and understand different ratings systems for television, movies, video games, and apps. And content on YouTube, the number one online destination for children, is not even rated at all.

In this incredibly confusing media environment, it is more important than ever that parents can rely on a ratings system that they can both understand and trust. The current television ratings system is neither easy-to-understand or trustworthy.

A 2007 Kaiser Family Foundation survey of about 1000 parents showed that "Most parents don't understand the TV ratings system. Most parents say they've heard of the TV ratings (81%) and the V-Chip (70%, up from 63% two years earlier). But even among those who say they've heard of the ratings, most don't understand what they mean." A 2016 study in Pediatrics suggested that the TV ratings system was ineffective and little help to parents, as violence was present even in TV shows for children as young as 7. Commenters Douglas Gentile, Joanne Cantor, and Brad Bushman have all studied ratings systems extensively and each provides much more evidence that the television ratings system as currently constituted does not work for families.

Families deserve a ratings board that features independent experts on child development and media effects and not just industry representatives. They need ratings that are easy-to-understand and give them the specific information they need to decide whether a program is appropriate for their children to watch. And they need ratings that are consistent with other media so that parenting in a digital age doesn't require mastering several different ratings systems.

We thank the FCC for undertaking this important review and would be happy to be a resource as the Commission designs and implements a new ratings system that actually helps families make healthy media choices.